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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:

DT Client Services LLC, *et al.*

MUR 6888

Response of DT Client Services LLC to the Second Supplemental Complaint

This responds to the Second Supplemental Complaint in MUR 6888 on behalf of DT Client Services LLC ("Trust"), a Delaware limited liability company that has formally changed its name since the filing of the original action and was formerly known as the GOP Data Trust LLC.

Like the original and first supplemental complaints, the latest filing is an act of political jousting devoid of substance. This second supplemental complaint, to the extent it discusses the Trust all, is factually inaccurate and fundamentally misunderstands the law as it applies to the Trust's business activities.

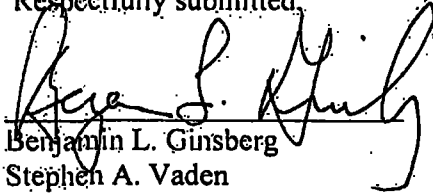
There is, in reality, nothing new in this filing concerning the Trust. Accordingly, below are the restated allegations and citations to the pages in the Trust's Response filed on Jan. 6, 2015 ("Trust Response") that refute the allegations repeated in the Second Supplemental Complaint:

- The Trust was not "created by the Republican National Committee". Supplemental Complaint at 1; Trust Response at 1-3, 9, 14-17;
- The Supplemental Complaint misstates the Trust's relationship with its clients, as well as the Trust's products and services. Supplemental Complaint at 1-2; Trust Response at 6-7, 9, 17-23.
- The content and conduct prongs, including the "common vendor" standard, are not met by the Trust's products and activities. Supplemental Complaint at 3-4; Trust Response at 23-27).
- The Trust and i360 are both for-profit entities. Their entering into a business relationship that each believes improves its products is not a violation of the Federal Election Campaign Act. Supplemental Complaint at 4; Trust Response at 8).

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Like its original Complaint, the Supplemental Complaint against DT is without merit and should be dismissed by the Commission.

Respectfully submitted,



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